

MICHAEL M. EDWARDS, ESQ.
Nevada Bar No. 6281
NICHOLAS L. HAMILTON
Nevada Bar No. 10893
Wolfenzon Rolle Edwards
6725 Via Austi Parkway, Suite 260
Las Vegas, Nevada 89119
(702)836-3138
medwards@wolfenzon.com
nhamilton@wolfenzon.com

Attorneys for Defendants Camping World, Inc.
Wheeler RV Las Vegas, LLC, and Winnebago Industries, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KIM BOLIBA,

Plaintiff,

vs.

CAMPING WORLD, INC.; CAMPING WORLD
RV SALES, LLC.; WHEELER LAS VEGAS RV
d/b/a CAMPING WORLD RV SALES,
WINNEBAGO INDUSTRIES, INC., DOES 1-10;
and ROE Corporations 1-10,

Defendants.

CASE NO.: 2:14-cv-01840-JAD-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANTS TO SERVE REPLY
TO THE PLAINTIFF'S RESPONSE
TO MOTION FOR SUMMARY
JUDGMENT [DOCKET #62]
MADE PURSUANT TO LR 6-1**

[FIRST REQUEST]

Based upon the stipulation set forth below, Defendants Camping World, Inc., Wheeler RV Las Vegas, LLC, and Winnebago Industries, Inc. ("Defendants") by and through their counsel of record, Michael M. Edwards, Esq. and Nicholas L. Hamilton, Esq. of Wolfenzon Rolle Edwards respectfully request that this Court enlarge the amount of time within which the Defendants must serve their Reply to the Plaintiff's Response to Defendants' Motion for Summary Judgment,¹ presently due December 17, 2015.

Plaintiff has previously requested an extension of time to serve his Opposition; however, Defendants have not requested an extension of time to file their reply prior to this stipulation.²

¹ Docket #62

² Docket # 56, 58 and 60.

1 This action involves warranty and breach of contract related claims arising from
2 Plaintiff's December 10, 2013 purchase of a new 2014 Winnebago Itasca Ellipse Model 42GD
3 motor home ("RV") from Camping World of Las Vegas. The Plaintiff seeks recovery under
4 the Nevada "Lemon Law," breach of contract, breach of express and implied warranties,
5 breach of the covenant of good faith and fair dealing, the Nevada Deceptive Trade Practices
6 Act, the Magnuson Moss Warranty Act and fraud. As such, the subject matter of the Plaintiff's
7 motion is very technical and fact specific.

8 The current deadline by which the Defendants must file a responsive pleading is
9 December 17, 2015, which falls within the midst of a very busy litigation schedule for
10 Defendants' counsel and this situation is compounded by the coming holidays.

11 The undersigned requests that the Defendants be allowed until January 20, 2016 to
12 submit their Reply.

13 The undersigned requests this extension to allow these matters to be appropriately and
14 thoughtfully briefed so that these matters may be fully considered by their merits.

15 This Request is sought in good faith.

16 In the interest of candor to the Court, and to ensure these pleading are appropriately
17 evaluated, the undersigned requests this extension so as to ensure all points raised in
18 opposition are appropriately articulated and adequately supported by the record. The very
19 fact specific nature of this litigation prevents the undersigned from preparing his opposition
20 within the normally allotted time. This request is not sought for the purpose of delay but so
21 these pleadings may be weighed according to their respective merits.

22 //

23 //

On the basis of the foregoing, the undersigned hereby stipulate and agree that the Defendants be allowed until January 20, 2016 to submit their Reply to the Plaintiff's Response to Defendants' Motion for Summary Judgment.³

DATED this 11th day of December, 2015.

DATED this 11th day of December, 2015.



MICHAEL M. EDWARDS, ESQ.
Nevada Bar No. 6281
NICHOLAS L. HAMILTON
Nevada Bar No. 10893
6725 Via Austi Parkway, Suite 260
Las Vegas, Nevada 89119
702-836-3138

/s/ Randal R. Leonard

RANDAL R. LEONARD, ESQ.
Nevada Bar No. 6716
500 South 8th Street
Las Vegas, NV 89101
(702) 598-3667/ office
(702) 598-3926/ facsimile
Attorney for Plaintiff

Attorneys for Defendants Camping World,
Inc., Wheeler RV Las Vegas, LLC. and
Winnebago Industries, Inc.

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: December 11, 2015

³ Docket #62